

re: Draft Bay TMDL
Concerning Docket ID #: EPA-RO3-OW-2010-0736

NOV 05 2010

Dear Sirs,

I am writing this letter as a dairy farmer in Rockingham County VA. with grave concerns about recently proposed regulations by the EPA, for the Chesapeake Bay watershed.

We farmers are committed to environmental stewardship. Clean water and good soil are fundamental to our businesses. We have been doing our part on our own and will continue to do so. Agriculture has met 52% of reduction goals for Nitrogen and 50% for Phosphorus and Sediment, all voluntarily. This does not include the many actions farmers take every day to try to reduce runoff - again on our own. Without cost-share funding Virginia farmers are fencing streams, practice conservative tillage, use proper nutrient management practices, and install buffers along waterways - without federal or state funds - and without being "coerced" by EPA.

The Chesapeake Bay Model has been shown to have extensive flaws in the data it uses. EPA even acknowledges this fact. EPA should not move ahead with costly mandates based upon flawed modeling and data. Federal actions must be based upon accurate information. No additional regulations or penalties should be put upon us until the science and data have been proven.

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We question the "reasonable assurance" offered EPA's backstops, as current regulations and detailed new requirements are both unclear. Instead of forcing states to regulate their way out of "backstops" we urge EPA to allow Virginia to implement its plans for achieving clean water goals - without a burdensome regulations.

Respectfully,
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